

UNITED STATES BANKRUPTCY COURT DISTRICT OF NEW JERSEY	
RAS Crane, LLC 10700 Abbott's Bridge Road, Suite 170 Duluth, GA 30097 Telephone Number 470-321-7112 Attorneys For Secured Creditor Laura Eggerman, Esq. (LE-8250)	CASE NO.: 19-21112-MBK CHAPTER 13
In Re: Barbara Ella Pavlick, Debtor.	

OBJECTION TO CONFIRMATION OF DEBTOR'S CHAPTER 13 PLAN

THE BANK OF NEW YORK MELLON F/K/A THE BANK OF NEW YORK AS TRUSTEE FOR HOME EQUITY LOAN TRUST 2007-FRE1 ("Secured Creditor"), by and through its undersigned counsel, objects to confirmation of Debtor's Chapter 13 Plan (DE # 3), and states as follows:

1. Debtor, Barbara Ella Pavlick, ("Debtor"), filed a voluntary petition pursuant to Chapter 13 of the Bankruptcy Code on June 3, 2019.
2. Secured Creditor holds a security interest in the Debtor's real property located at 112 SINCLAIR AVE, LACEY TOWNSHIP, NJ 08734 (the "Property").
3. The Debtor filed a Chapter 13 Plan and Motions ("Plan") on June 3, 2019.
4. Debtor's Plan proposes to value the Property at \$129,630.00 and strip Secured Creditor's second lien. Secured Creditor disputes this valuation. Until a final determination on valuation occurs, it would be premature to consider confirming Debtor's Plan.
5. The Plan does not appear feasible due to inadequate treatment of Secured Creditor's claim. This, the Plan violates the provisions of 11 U.S.C. §1325(a)(3) and cannot be confirmed.
6. Secured Creditor reserves the right to supplement its objection.

WHEREFORE, Secured Creditor respectfully requests this Court sustain the objections stated herein and deny confirmation of Debtor's Plan, and for such other and further relief as the Court may deem just and proper.

RAS Crane, LLC
Attorney for Secured Creditor
10700 Abbott's Bridge Road, Suite 170
Duluth, GA 30097
Telephone Number 470-321-7112

By: /s/Laura Eggerman
Laura Eggerman, Esquire
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CERTIFICATION OF SERVICE

1. I, Laura Eggerman, represent THE BANK OF NEW YORK MELLON F/K/A THE BANK OF NEW YORK AS TRUSTEE FOR HOME EQUITY LOAN TRUST 2007-FRE1 in this matter.
2. On July 8, 2019, I caused a copy of the following pleadings and/or documents to be sent to the parties listed in the chart below. Objection to Confirmation of Debtor's Chapter 13 Plan.
3. I certify under penalty of perjury that the above documents were sent using the mode of service indicated.

July 8, 2019

RAS Crane, LLC
Attorney for Secured Creditor
10700 Abbott's Bridge Road, Suite 170
Duluth, GA 30097
Telephone Number 470-321-7112

By: /s/Laura Eggerman
Laura Eggerman, Esquire
NJ Bar Number LE-8250
Email: legerman@rasnj.com

<u>Name and Address of Party Served</u>	<u>Relationship of Party to the Case</u>	<u>Mode of Service</u>
William H. Oliver, Jr. 2240 State Highway 33 Suite 112 Neptune, NJ 07753	Attorney for Debtor	<input type="checkbox"/> Hand-delivered <input checked="" type="checkbox"/> Regular mail <input type="checkbox"/> Certified Mail/RR <input type="checkbox"/> E-mail <input checked="" type="checkbox"/> Notice of Electronic Filing (NEF) <input type="checkbox"/> Other <hr/> (as authorized by the court*)
Barbara Ella Pavlick 1403 Red Feather Trail Browns Mills, NJ 08015-6313	Debtor	<input type="checkbox"/> Hand-delivered <input checked="" type="checkbox"/> Regular mail <input type="checkbox"/> Certified Mail/RR <input type="checkbox"/> E-mail <input type="checkbox"/> Notice of Electronic Filing (NEF) <input type="checkbox"/> Other <hr/> (as authorized by the court*)
Albert Russo Standing Chapter 13 Trustee CN 4853 Trenton, NJ 08650-4853	Trustee	<input type="checkbox"/> Hand-delivered <input checked="" type="checkbox"/> Regular mail <input type="checkbox"/> Certified Mail/RR <input type="checkbox"/> E-mail <input checked="" type="checkbox"/> Notice of Electronic Filing (NEF) <input type="checkbox"/> Other <hr/> (as authorized by the court*)
U.S. Trustee US Dept of Justice Office of the US Trustee One Newark Center Ste 2100 Newark, NJ 07102	U.S. Trustee	<input type="checkbox"/> Hand-delivered <input checked="" type="checkbox"/> Regular mail <input type="checkbox"/> Certified Mail/RR <input type="checkbox"/> E-mail <input checked="" type="checkbox"/> Notice of Electronic Filing (NEF) <input type="checkbox"/> Other <hr/> (as authorized by the court*)